

DANIEL G. BOGDEN
 United States Attorney
 District of Nevada
 LISA C. CARTIER GIROUX
 Assistant United States Attorney
 333 Las Vegas Boulevard South
 Suite 5000
 Las Vegas, Nevada 89101
 702-388-6336

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
APR 1 - 2015	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TYRAL EDWARD KING and
 SHA-RON HAINES,

Defendants.

) **SUPERSEDING**

) **CRIMINAL INDICTMENT**

) **Case No. 2:14-cr-00264-APG-VCF**

) **VIOLATIONS:**

) COUNT ONE

) TITLE 18, UNITED STATES CODE,

) SECTION 1594(c) – Conspiracy to Commit Sex

) Trafficking

) COUNT TWO

) TITLE 18, UNITED STATES CODE,

) SECTIONS 1591(a)(1), (a)(2), (b)(2) and (c);

) TITLE 18, UNITED STATES CODE,

) SECTION 2 – Sex Trafficking

) COUNT THREE

) TITLE 18, UNITED STATES CODE,

) SECTION 1594(c) – Conspiracy to Transport

) for Prostitution or Other Illegal Sexual Activity

) COUNT FOUR

) TITLE 18, UNITED STATES CODE,

) SECTION 2423(a); TITLE 18, UNITED

) STATES CODE, SECTION 2 – Transportation

) for Prostitution or Other Illegal Sexual Activity

THE GRAND JURY CHARGES THAT:

COUNT ONE

Conspiracy to Commit Sex Trafficking

From on or about April 2014, to on or about May 24, 2014, in the State and Federal

District of Nevada and elsewhere, did knowingly and intentionally combine, conspire,

**TYRAL EDWARD KING and
SHA-RON HAINES,**

confederate and agree with others known and unknown to the Grand Jury to, recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, "J.," a minor, knowing and in reckless disregard of the fact that such person had not attained the age of 18 years and would be caused to engage in a commercial sex acts in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2) and (c). All in violation of Title 18, United States Code, Section 1594(c).

COUNT TWO
Sex Trafficking

From on or about April 2014, to on or about May 24, of 2014, in the State and Federal District of Nevada and elsewhere,

**TYRAL EDWARD KING and
SHA-RON HAINES,**

aiding and abetting one another, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, in and affecting interstate commerce, "J.," knowing and in reckless disregard of the fact that said person had not attained the age of 18 years and would be caused to engage in a commercial sex acts. All in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), (b)(2) and (c), and Title 18, United States Code, Section 2.

COUNT THREE
Conspiracy to Transport for Prostitution or Other Illegal Sexual Activity

From on or about April 2014 to on or about May 24, 2014, in the State and Federal District of Nevada and elsewhere,

**TYRAL EDWARD KING and
SHA-RON HAINES,**

1 did knowingly and intentionally combine, conspire, confederate and agree with others known
2 and unknown to the Grand Jury to transport an individual, that is, "J," a minor, who at that time
3 was under the age of 18 years, in interstate commerce from in or about Las Vegas, Nevada to
4 California, with intent that such individual engage in prostitution and sexual activity for which
5 any person can be charged with a criminal offense, all in violation of Title 18, United States
6 Code, Sections 2423(a). All in violation of Title 18, United States Code, Section 1594(c).

7 COUNT FOUR

8 *Transportation for Prostitution or Other Illegal Sexual Activity*

9 From on or about April 2014, to on or about May 24, 2014, in the State and Federal
10 District of Nevada and elsewhere,

11 **TYRAL EDWARD KING and
SHA-RON HAINES,**

12 defendants herein, did knowingly transport an individual, that is, "J," a minor, who at that time
13 was under the age of 18 years, in interstate commerce from in or about Las Vegas, Nevada to
14 California, with intent that such individual engage in prostitution and sexual activity for which
15 any person can be charged with a criminal offense. All in violation of Title 18, United States
16 Code, Sections 2423(a) and 2.

17 **DATED:** this 1st day of April, 2015

18 **A TRUE BILL:**

19
20 /S/
FOREPERSON OF THE GRAND JURY

21 DANIEL G. BOGDEN
United States Attorney

22 
23 LISA C. CARTIER GIROUX
24 Assistant United States Attorney